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Attorneys for Henry Shahery

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Chapter 11
SEARS HOLDINGS CORPORATION, *et al.*,) Case No. 18-23538 (RDD)
Debtors.) (Jointly Administered)
)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Hunton Andrews Kurth LLP hereby appears as counsel for Henry Shahery, a party-in-interest in the above-captioned proceeding pursuant to 11 U.S.C. § 1109(b) and Rules 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”).

PLEASE TAKE FURTHER NOTICE that Henry Shahery hereby requests, pursuant to Bankruptcy Rules 2002, that copies of all notices and pleadings given or required to be given, and all papers served or required to be served, be given and served upon the following persons at the address and telephone number indicated:

HUNTON ANDREWS KURTH LLP
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with a copy to

Law Offices of Saul Reiss
2800 28th Street, Suite 328
Santa Monica, California 90405-6201
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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, all orders and notices of any applications, petitions, motions, complaints, requests or demands, hearings, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document filed with, or otherwise brought before, this Court with respect to the above-captioned adversary proceeding, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, e-mail, telex or otherwise.

PLEASE TAKE FURTHER NOTICE that Henry Shahery intends that neither this *Notice of Appearance and Request for Service of Papers* nor any later appearance, pleading, claim or suit shall waive (i) Henry Shahery's right to have final orders in non-core matters entered only after de novo review by a higher court, (ii) Henry Shahery's right to trial by jury in any proceeding so triable in any case, controversy, or proceeding related to these bankruptcy cases, (iii) Henry Shahery's right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal, (iv) Henry Shahery's right to enforce any contractual provisions with respect to arbitration, or (v) any other rights, claims, actions, defenses, setoffs, or recoupments to which Henry Shahery is or may be entitled under agreements, in law or in equity, including the right to contest the jurisdiction of the United States Bankruptcy Court for the Southern District of New York over Henry Shahery, all of which rights, claims, actions, defenses, setoffs, and recoupments Henry Shahery expressly reserves.

Dated: August 21, 2019
New York, New York

/s/Paul N. Silverstein

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